

EXHIBIT A

Redline Comparison of Plaintiffs' Original and Amended
Pretrial Disclosure

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF NORTH CAROLINA
WESTERN DIVISION**

GRAHAM YATES and)	EDNC File No.5:12-cv-00752-FL
BECKY YATES, spouse,)	
)	
Plaintiffs,)	
)	
v.)	
)	
FORD MOTOR COMPANY, et al.,)	
)	
)	
Defendants.)	

PLAINTIFFS' AMENDED RULE 26(a)(3) PRETRIAL DISLCOSURES NOW

COME the Plaintiffs, by and through their undersigned counsel of record, and respectfully submits their Rule 26(a)(3) Pretrial Disclosures.

I. Witnesses

A. Live Witnesses

~~a. — Graham Yates
1229 Turner Meadow Drive
Raleigh, NC 27603
(919) 772-7285~~

a. ~~b.~~ Becky Yates (spouse)
1229 Turner Meadow Drive
Raleigh, NC 27603
(919) 772-7285

~~e. — Cristy Sloan Yates (daughter)
Raleigh, NC~~

b. ~~d.~~ Tracy Yates (daughter)
San Diego, CA

c. ~~e.~~ Dr. Eugene Mark
Massachusetts General Hospital
55 Fruit Street, Warren 244

Boston, Massachusetts 02114
(617) 726-8891

d. ~~f.~~ Arnold R. Brody, Ph.D.
Department of Molecular Biomedical Sciences
North Carolina State University
4700 Hillsborough St.
Raleigh, NC 27606

(919) 513-7662

~~g-e.~~ Steve M. Hays, PE, CIH
Gobbell Hays Partners, Inc.
217 Fifth Avenue, North
Nashville, Tennessee 37219
(615) 254-8500

B. Witness for Authentication of Documents (only if authentication disputed by defendants)

1. Robert Marecek (Librarian & Custodian of Records for the N.S.C.)
National Safety Council Office
1121 Spring Lake Drive
Itasca, Illinois 60143-3201
(630) 285-1121
2. Sally J. Wilke (Custodian of IHF documents)
Industrial Hygiene Foundation
34 Penn Circle West
Pittsburgh, PA 15206
3. Edward Drislane
Friction Materials Standards Institute (FMSI)
23 Woodland Road, Suite B-3
Madison, Ct 06443
(203) 245-8425

II. Designation of Witnesses by Deposition

Plaintiffs intend to introduce the following transcripts by video:

- A. Graham yates Discovery and *de benne esse* depositions taken on February 13, ~~2013, if witness is unable or unavailable to testify at trial.~~ 2013.
- B. Honeywell International Inc.'s Corporate Representatives (Rule 30(b)(6) Designated Witnesses)
 1. Joel Charm – Transcript taken on August 28, 2009 and September 2, 2009 in *Boman et al., v. Alfa Laval et al.*, No. BC 405823, in the Superior Court, Los Angeles County, California.
 2. Joel Cohen – Transcript taken on November 21, 2013 in *Charity Phillips, et al.*, No. 12CECG04055, in the Superior Court of California in the County of Fresno.

3. Eugene Rogers – Transcripts taken on January 12, 1993 in *Fassler v. Fiberboard Corporation, et al.*, No. 92-01061 in the 261st Judicial District, Travis County, Texas; January 5, 1984 in *Jacque, et al., v. Johns-Manville Corporation, et al.*, in the Superior Court, Los Angeles County, California.
 4. Albert Shaw – Transcript taken on October 4, 2013 in *Erhart, et al., v. CSK Auto, Inc., et al.*, No. BC473955, in the Superior Court, Los Angeles County, California.
- C. Ford Motor Company's Corporate Representatives (Rule 30(b)(6) Designated Witnesses)
1. Lawrence Roslinski – Transcript taken on January 3, 2008 in *Edward Guerra v. Bondex International, Inc., et al.*, in the Superior Court of the State of California, for the County of Los Angeles; Case No. BC 365479.
 2. Mark Taylor – Transcripts taken on September 1, 2009 in *Lawrence and Shirley Bowman v. Alfa Laval, Inc. et al.*, Case No. BC405823 in the Superior Court of California, Los Angeles County; July 30, 2008 in *John Russell, et al., v. Alcatel-Lucent Managed Solutions, LLC, et al.*, No. BC38030 in the Superior Court of the State of California, County of Los Angeles; July 7, 2011 in *James W. Ginter v. Ford Motor Company*, No. 4061-2010 in the Supreme Court of the State of New York, County of Erie; February 24, 2009 in *Dorothy F. Burger, et al., v. Amcord, Inc., et al.*, Case No. BC370746 in the Superior Court of California, Los Angeles County.
 - ~~3. Matthew Fyie – Transcript taken on January 16, 2013 in *Christine Reaser, et al., v. A.W. Chesterton Company*, in the Superior Court of Los Angeles County, California, No. BC411344.~~
 - ~~4. Robert Dolan – Transcript taken on October 6, 2011 in *Robert Dolan v. Acme Liquidating Corp., et al.*, in the Supreme Court of the State of New York County of Oneida, New York~~

D. Exponent and Cardno ChemRisk LLC Witnesses

1. Dennis Paustenbach – Transcripts taken in the upcoming June 17, 2015 video deposition taken in the above-captioned Yates case and in In Re: All Litigation Filed by Maune Raichle Hartley French and

Mudd, LLC, in the Circuit Court for the 3rd Judicial District
Madison County, IL.

2. Mark Garavaglia – Transcripts taken in the upcoming June 18, 2015
video deposition taken in the above-captioned Yates and in In Re:
All Litigation Filed by Maune Raichle Hartley French and Mudd,
LLC, in the Circuit Court for the 3rd Judicial District Madison
County, IL.

3. Amy Madl – Transcript taken in the *Donna Foote, et al., v. Borg Warner, Corp, et. al.* (Iowa) to occur on June 18, 2015.
4. Richard Schenkler – Transcripts taken in the upcoming June 19, 2015 video deposition in the above-captioned Yates case and in In Re: All Litigation Filed by Maune Raichle Hartley French and Mudd, LLC, in the Circuit Court for the 3rd Judicial District Madison County, IL.
5. Patrick Sheehan – Transcripts taken in the upcoming June 18, 2015 video deposition in the above-captioned Yates case and in In Re: All Litigation Filed by Maune Raichle Hartley French and Mudd, LLC, in the Circuit Court for the 3rd Judicial District Madison County, IL.

III. Document and Exhibit List

Plaintiffs list of documents and other exhibits that it expects to offer at the trial of this matter, or may offer if the need arises, is incorporated herein by reference as Exhibit A. Plaintiffs reserve the right to amend or supplement this exhibit list, and/or to adopt the exhibit list of any defendant in this matter.

This ~~22nd~~ 10th day of ~~March~~ June, 2015.

Respectfully submitted,

/s/Kevin Paul

Kevin Paul, Pro Hac Vice
MSBA #12869
Attorney for Plaintiff

Simon Greenstone Panatier Bartlett
3232 McKinney Ave, Ste 610
Dallas, TX 75204
214-276-7680
kpaul@sgpblaw.com

Janet Ward Black NC
State Bar 12869
Attorney for Plaintiff
Ward Black Law 208
W. Wendover Ave.
Greensboro, NC 27401
336-333-2244
jwblack@wardblacklaw.com

**ATTORNEYS FOR
PLAINTIFF**

CERTIFICATE OF SERVICE

The undersigned certifies that a copy of the foregoing document was served upon the attorneys of record via e-mail on this ~~22nd~~ 10th day of ~~March~~ June, 2015.

/s/Kevin Paul
Kevin Paul

Document comparison by Workshare Compare on Friday, June 12, 2015 1:03:37 PM

Input:	
Document 1 ID	file:///C:/Users/nshaw/Documents/4624227_1.docx
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Document 2 ID	file:///C:/Users/nshaw/Documents/26a3 Pretrial Disclosures.docx
Description	26a3 Pretrial Disclosures
Rendering set	Standard

Legend:	
<u>Insertion</u>	
Deletion	
<u>Moved from</u>	
<u>Moved to</u>	
Style change	
Format change	
Moved deletion	
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Deleted cell	
Moved cell	
Split/Merged cell	
Padding cell	

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Moved from	0
Moved to	0
Style change	0
Format changed	0
Total changes	37